

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION

NO. 08-70

MICHAEL ALAN CROOKER, )  
PLAINTIFF. )  
V. )  
ARROW FINANCIAL SERVICES, )  
DEFENDANT. )  
COMPLAINT UNDER THE FAIR DEBT  
COLLECTION PRACTICES ACTS

JURISDICTION

(1) This is a civil action against a debt collector pursuant to the state and federal Fair Debt Collection Practices Acts. The Superior Courts of the Commonwealth have concurrent jurisdiction with the federal courts pursuant to 15 U.S.C. 1692k(d).

PARTIES

(2) The plaintiff is a citizen and resident of Massachusetts. He is currently confined pursuant to a jury-tried judgment of the United States District Court for the District of Massachusetts, United States v. Crooker, CR-04-30034-MAP which is presently on appeal to the First Circuit U.S. Court of Appeals, No. 07-1964. Plaintiff's address is Prisoner No. 03631-158, Federal Correctional Institution - 1 - Victorville, P.O. Box 5300, Adelanto, California 92301.

(3) The defendant, Arrow Financial Services, is a debt collector as defined in 15 U.S.C. 1692a(6), and their business address is 5996 West Touhy Ave., Niles, Illinois 60714.

FACTS

(4) Defendant debt collector purchased consumer debt of the plaintiff's which had become delinquent due to plaintiff's detention by federal authorities.

(5) Defendant has bombarded plaintiff's family members with many demand letters while plaintiff has been detained.

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(6) Defendant has telephoned plaintiff's family members in Massachusetts at unusual hours of the daytime and nighttime.

(7) Defendant's contacts have continued even though they were informed that plaintiff is in official detention.

(8) Defendant has threatened plaintiff's family that he would be charged with credit fraud and his detention lengthened if the debt was not paid.

LEGAL CLAIMS

(9) The facts described above in paragraph (5) constitute a violation of 15 U.S.C. 1692c(b).

(10) The facts described above in paragraph (6) constitute a violation of 15 U.S.C. 1692c(a)(1) as well as 1692d(5) and (6).

(11) The facts described above in paragraph (8) constitute a violation of 15 U.S.C. 1692e(4).

RELIEF

WHEREFORE, plaintiff requests \$100,000 in compensatory damages, attorney's fees and costs, a jury trial on all issues triable, appointment of counsel, and such other and further relief as the court deems just and proper.

Respectfully submitted,



Michael Alan Crooker, pro se  
Prisoner No. 03631-158  
Federal Correctional Institution - 1 -  
Victorville  
P.O. Box 5300  
Adelanto, CA 92301

Dated: December 18, 2007

(TO PLAINTIFF'S ATTORNEY: **PLEASE CIRCLE TYPE OF ACTION INVOLVED:**  
 **TORT - MOTOR VEHICLE TORT - CONTRACT -  
EQUITABLE RELIEF - OTHER**)

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION

NO **08 00070**

Michael Alan Crooker, Plaintiff(s)

v.

Arrow Financial Services, Defendant(s)

SUMMONS

To the above-named Defendant: Arrow Financial Services

Michael Alan Crooker, pro se  
Prisoner no. 03631-158

FCI-1-Victorville, PO Box 5300, Adelanto, CA 92301  
You are hereby summoned and required to serve upon plaintiff's attorney, whose address is \_\_\_\_\_, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Dedham either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

WITNESS, BARBARA J. RUUSE, Esquire, at Dedham the 18th

day of January, in the year of our Lord two thousand and eight.

  
Walter F. Dimity Clerk.

NOTES:

1. This summons is issued pursuant to Rules 4 of the Massachusetts Rules of Civil Procedure.
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each such defendant, each should be addressed to the particular defendant.

**Commonwealth of Massachusetts**

**County of Norfolk**  
**The Superior Court**

CIVIL DOCKET # NOCV2008-00070 A  
 Courtroom CtRm 4

RE: **Crooker v Arrow Financial Services**  
 TO:

Michael Alan Crooker  
 Federal Correctional Institution  
 P.O.Box 5300  
 Adelanto, CA 92301

**SCHEDULING ORDER FOR F TRACK**

You are hereby notified that this case is on the track referenced above as per Superior Court Standing Order 1-88. The order requires that the various stages of litigation described below must be completed not later than the deadlines indicated, and case shall be resolved and judgment shall issue 11/01/2009.

<b>STAGES OF LITIGATION</b>	<b>DEADLINES</b>		
	<b>SERVED BY</b>	<b>FILED BY</b>	<b>HEARD BY</b>
Service of process made and return filed with the Court	04/10/2008	04/10/2008	
Response to the complaint filed (also see MRCP 12)		05/10/2008	
All motions under MRCP 12, 19, and 20	05/10/2008	06/09/2008	07/09/2008
All motions under MRCP 15	05/10/2008	06/09/2008	07/09/2008
All discovery requests and depositions served and non-expert depositions completed	11/06/2008		
All motions under MRCP 56	12/06/2008	01/05/2009	
Final pre-trial conference held and/or firm trial date set			05/05/2009
Case shall be resolved and judgment shall issue by <b>11/01/2009</b>			<b>11/01/2009</b>

- The final pre-trial deadline is not the scheduled date of the conference.
- You will be notified of that date at a later time.
- Counsel for plaintiff must serve this tracking order on defendant before the deadline for filing return of service.

Dated: 01/11/2008

Walter F. Timilty  
 Clerk of the Court

Telephone: (781) 326-1600